

UNITED STATES DISTRICT COURT

for the
Eastern District of Missouri

In the Matter of the Search of)
 INFORMATION ASSOCIATED WITH GOOGLE USER)
 ID 102087566311001970623 THAT IS STORED AT)
 PREMISES CONTROLLED BY GOOGLE, LLC.)

Case No. 4:22 MJ 8018 (SRW)

) SUBMITTED TO THE COURT AND
) SIGNED BY RELIABLE ELECTRONIC MEANS

APPLICATION FOR A SEARCH WARRANT

I, DREW POLAN, a federal law enforcement officer or an attorney for the government request
 a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

SEE ATTACHMENT A

located in the NORTHERN District of CALIFORNIA, there is now concealed

SEE ATTACHMENT B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☐ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

Title 21, U.S.C., §§ 846, 841(a)(1)

Conspiracy to possess with intent to distribute controlled substance(s)

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE.

☒ Continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested
 under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

I state under the penalty of perjury that the foregoing is true and correct.

Drew Polan, Senior Inspector
United States Marshals Service

Printed name and title

Sworn to, attested to, and affirmed before me via
 reliable electronic means pursuant to Federal Rules of
 Criminal Procedure 4.1 and 41.

Date: January 19, 2022

City and State: St. Louis, MO

Stephen R. Welby
 Judge's signature

STEPHEN R. WELBY, U.S. Magistrate Judge

Printed name and title

AUSA: STEPHEN CASEY

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with **Google User ID 102087566311001970623** that is stored at premises owned, maintained, controlled, or operated by Google, LLC., a company headquartered at 1600 Amphitheatre Parkway Mountain View, CA 94043.

ATTACHMENT B

Particular Things to be Seized

To the extent that the information described in Attachment A is within the possession, custody, or control of Google, LLC., regardless of whether such information is located within or outside of the United States, and including any messages, records, files, logs, or information that have been deleted but are still available to Google, LLC., or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Google, LLC. is required to disclose the following information to the government for each account or identifier listed in Attachment A:

For all Google Accounts that are linked to any of the accounts listed in Attachment A by cookies; recovery, secondary, forwarding; or alternate email address; Android ID; IMEI; or telephone number, including SMS recovery number or sign-in account number, provide:

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, service addresses, residential addresses, business addresses, and e-mail addresses);
3. Local and long-distance telephone connection records (including records of text messages sent and received) from **January 1, 2021, to the Present**, if applicable;
4. Records of session times and durations from **January 1, 2021, to the Present**;
5. Length of service (including start date) and types of service utilized;
6. Telephone or instrument numbers (including model type/numbers, phone numbers, IMSIs, IMEIs, MEIDs, UDIDs, MAC addresses, and advertising IDs);
7. Other subscriber numbers or identities, including any temporarily assigned network addresses (including the registration and session Internet Protocol ("IP") addresses with associated port numbers); and

8. Means and source of payment for such service (including any credit card or bank account number)

Google is hereby ordered to disclose the above information to the government within 14 days of the date of this warrant.

I. Information to be seized by the government

All information described above in Section I that constitutes information that will assist law enforcement in arresting Glenn Williams, who is a “person to be arrested” within the meaning of Federal Rule of Criminal Procedure 41(c)(4):

- a. Evidence indicating how and when the Account was accessed or used, to determine the geographic and chronological context of account access, use, and events relating to the crime under investigation and to the email account owner;
- b. The identity of the person(s) who created or used the Account, including records that help reveal the whereabouts of such person(s).
- c. The identity of the person(s) who communicated with the Account, including records that help reveal their whereabouts.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

IN THE MATTER OF THE SEARCH OF)
INFORMATION ASSOCIATED WITH) No. 4:22 MJ 8018 (SRW)
Google User ID 102087566311001970623)
THAT IS STORED AT PREMISES)
CONTROLLED BY GOOGLE, LLC.) **FILED UNDER SEAL**
) SUBMITTED TO THE COURT AND
) SIGNED BY RELIABLE ELECTRONIC
) MEANS

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Senior Inspector Drew Polan, with the United States Marshals Service, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with a certain account that is stored at premises owned, maintained, controlled, or operated by Google LLC ("Google"), an electronic communications service and/or remote computing service provider headquartered at 1600 Amphitheater Parkway, Mountain View, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Google to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

2. I, Drew Polan, am a Senior Inspector with the United States Marshals Service ("USMS") and, as such, I am charged with enforcing all laws in all jurisdictions of the United

States, its territories and possessions. My current duty assignment is in the Investigative Operations Division, Organized Crime and Gangs Branch. My primary duty and assignment obligates me to investigative, locate, and apprehend fugitives, and support fugitive investigative efforts on behalf of the USMS. I have been employed with the USMS for 13 years and have a cumulative total of 16 years of experience as a federal law enforcement officer. I have been assigned to fugitive investigations for more than 10 years and have been the lead investigator in more than 700 fugitive investigations, in addition to providing investigative assistance in other cases. My experience also includes the utilization of various electronic surveillance measures, empowered through legal process, in over 100 investigations.

3. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. The United States Marshals Service has probable cause to believe that the Subject Account is currently being used by Glenn WILLIAMS who is charged with conspiracy to distribute methamphetamine, heroin, and fentanyl, in violation of Title 21, United States Code, Section 846 and possessing a firearm in furtherance of a drug trafficking crime in violation of Title 18, United States Code, Section 924(c), in Case No. 4:21-CR-00554, and whose whereabouts are currently unknown.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that information regarding the whereabouts of Glenn WILLIAMS will be found in the location described in Attachment A for evidence described in Attachment B.

LOCATION TO BE SEARCHED

6. This warrant applies to information associated with **Google User ID 102087566311001970623** that is stored at premises owned, maintained, controlled, or operated by

Google, LLC., a company headquartered at 1600 Amphitheatre Parkway Mountain View, CA 94043.

JURISDICTION

7. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

8. Law enforcement, including the United States Marshals Service (USMS), is conducting a fugitive investigation for Glenn WILLIAMS.

9. WILLIAMS was charged in Case No. 4:21-CR-00554 with conspiracy to distribute methamphetamine, heroin, and fentanyl, in violation of Title 21, United States Code, Section 846, and possessing a firearm in furtherance of a drug trafficking crime in violation of Title 18, United States Code, Section 924(c). The indictment was returned by the Grand Jury, and an arrest warrant issued for WILLIAMS, on October 13, 2021. Efforts to arrest WILLIAMS were unsuccessful, and a fugitive investigation was initiated.

10. In furtherance of the fugitive investigation, on October 19, 2021, USMS investigators conducted an interview of Alexandria Venoya-Williams, Williams’ estranged wife and the mother of his two minor children. During the interview, Venoya-Williams indicated she communicated primarily through the use of an e-mail account she knew belonged to Williams and provided the email address glennj.williams@yahoo.com.

11. On October 28, 2021, I obtained a federal search warrant for records associated to glennj.williams@gmail.com in case 4:21 MJ 299 (DDN). Yahoo! later provided records pursuant

to the search warrant. Records indicated the e-mail account was used somewhat infrequently and had not been accessed since September 2021.

12. Through the use of database inquiries, United States Marshals Service investigators subsequently learned that the aforementioned Yahoo! e-mail was also associated to **Google User ID 102087566311001970623**. Because Google User ID associates a persistent ID for a single user with that user's engagement data from one or more sessions initiated from one or more devices, as well as the ability to store login information, associated email addresses, transactional data, and other information as it relates to users and devices that have connected to the Google LLC network, servers, and/or systems, it is believed that it is highly likely that Glenn WILLIAMS, despite discontinuing the use of the Yahoo! e-mail address, likely interfaces with new or different email addresses, or telecommunications devices, and that information would be associated with **Google User ID 102087566311001970623**.

BACKGROUND CONCERNING GOOGLE¹

13. Google is a United States company that offers to the public through its Google Accounts a variety of online services, including email, cloud storage, digital payments, and productivity applications, which can be accessed through a web browser or mobile applications. Google also offers to anyone, whether or not they have a Google Account, a free web browser called Google Chrome, a free search engine called Google Search, a free video streaming site called YouTube, a free mapping service called Google Maps, and a free traffic tracking service

¹ The information in this section is based on information published by Google on its public websites, including, but not limited to, the following webpages: the "Google legal policy and products" page available to registered law enforcement at lens.google.com; product pages on support.google.com; or product pages on about.google.com.

called Waze. Many of these free services offer additional functionality if the user signs into their Google Account.

14. In addition, Google offers an operating system (“OS”) for mobile devices, including cellular phones, known as Android. Google also sells devices, including laptops, mobile phones, tablets, smart speakers, security cameras, and wireless routers. Users of Android and Google devices are prompted to connect their device to a Google Account when they first turn on the device, and a Google Account is required for certain functionalities on these devices.

15. Signing up for a Google Account automatically generates an email address at the domain gmail.com. That email address will be the log-in username for access to the Google Account.

16. Google advertises its services as “One Account. All of Google working for you.” Once logged into a Google Account, a user can connect to Google’s full suite of services offered to the general public, described in further detail below. In addition, Google keeps certain records indicating ownership and usage of the Google Account across services, described further after the description of services below.

17. Google integrates its various services to make it easier for Google Accounts to access the full Google suite of services. For example, users accessing their Google Account through their browser can toggle between Google Services via a toolbar displayed on the top of most Google service pages, including Gmail and Drive. Google Hangout, Meet, and Chat conversations pop up within the same browser window as Gmail. Attachments in Gmail are displayed with a button that allows the user to save the attachment directly to Google Drive. If someone shares a document with a Google Account user in Google Docs, the contact information for that individual will be saved in the user’s Google Contacts. Google Voice voicemail transcripts

and missed call notifications can be sent to a user's Gmail account. And if a user logs into their Google Account on the Chrome browser, their subsequent Chrome browser and Google Search activity is associated with that Google Account, depending on user settings.

18. When individuals register with Google for a Google Account, Google asks users to provide certain personal identifying information, including the user's full name, telephone number, birthday, and gender. If a user is paying for services, the user must also provide a physical address and means and source of payment.

19. Google typically retains and can provide certain transactional information about the creation and use of each account on its system. Google captures the date on which the account was created, the length of service, log-in times and durations, the types of services utilized by the Google Account, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account (such as logging into the account via Google's website or using a mobile application), details about the devices used to access the account, and other log files that reflect usage of the account. In addition, Google keeps records of the Internet Protocol ("IP") addresses used to register the account and accept Google's terms of service, as well as the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the Google Account.

20. Google maintains the communications, files, and associated records for each service used by a Google Account on servers under its control. Even after a user deletes a communication or file from their Google Account, it may continue to be available on Google's servers for a certain period of time.

21. In my training and experience, evidence of who was using a Google account and from where, and evidence related to criminal activity of the kind described above, may be found in the files and records described above. This evidence may establish the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or, alternatively, to exclude the innocent from further suspicion.

22. Based on my training and experience, messages, emails, voicemails, photos, videos, documents, and internet searches are often created and used in furtherance of criminal activity, including to communicate and facilitate the offenses under investigation. Thus, stored communications and files connected to a Google Account may provide direct evidence of the offenses under investigation.

23. In addition, the user’s account activity, logs, stored electronic communications, and other data retained by Google can indicate who has used or controlled the account. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. For example, subscriber information, email and messaging logs, documents, and photos and videos (and the data associated with the foregoing, such as geo-location, date, and time) may be evidence of who used or controlled the account at a relevant time. As an example, because every device has unique hardware and software identifiers, and because every device that connects to the Internet must use an IP address, IP address and device identifier information can help to identify which computers or other devices were used to access the account. Such information also allows investigators to understand the geographic and chronological context of access, use, and events relating to the crime under investigation.

24. Account activity may also provide relevant insight into the account owner’s state of mind as it relates to the offenses under investigation. For example, information on the account

may indicate the owner's motive and intent to commit a crime (*e.g.*, information indicating a plan to commit a crime), or consciousness of guilt (*e.g.*, deleting account information in an effort to conceal evidence from law enforcement).

25. Therefore, Google's servers are likely to contain stored electronic communications and information concerning subscribers and their use of Google services. In my training and experience, such information may constitute evidence of the crimes under investigation including information that can be used to identify the account's user or users.

CONCLUSION

26. Based on the forgoing, I request that the Court issue the proposed search warrant.

27. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving the warrant on Google. Because the warrant will be served on Google, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

28. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because

their premature disclosure may give targets an opportunity to flee/continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, notify confederates, or otherwise seriously jeopardize the investigation.

I state under the penalty of perjury that the foregoing is true and correct.



DREW POLAN
SENIOR INSPECTOR - USMS

Sworn to, attested to, or affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 this 19th day of January, 2022.



STEPHEN R. WELBY
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property to Be Searched

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For all Google Accounts that are linked to any of the accounts listed in Attachment A by cookies; recovery, secondary, forwarding; or alternate email address; Android ID; IMEI; or telephone number, including SMS recovery number or sign-in account number, provide:

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, service addresses, residential addresses, business addresses, and e-mail addresses);
3. Local and long-distance telephone connection records (including records of text messages sent and received) from **January 1, 2021, to the Present**, if applicable;
4. Records of session times and durations from **January 1, 2021, to the Present**;
5. Length of service (including start date) and types of service utilized;
6. Telephone or instrument numbers (including model type/numbers, phone numbers, IMSIs, IMEIs, MEIDs, UDIDs, MAC addresses, and advertising IDs);
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8. Means and source of payment for such service (including any credit card or bank account number)

Google is hereby ordered to disclose the above information to the government within 14 days of the date of this warrant.

I. Information to be seized by the government

All information described above in Section I that constitutes information that will assist law enforcement in arresting Glenn Williams, who is a “person to be arrested” within the meaning of Federal Rule of Criminal Procedure 41(c)(4):

- a. Evidence indicating how and when the Account was accessed or used, to determine the geographic and chronological context of account access, use, and events relating to the crime under investigation and to the email account owner;
- b. The identity of the person(s) who created or used the Account, including records that help reveal the whereabouts of such person(s).
- c. The identity of the person(s) who communicated with the Account, including records that help reveal their whereabouts.